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Of Attorneys for
Defendant Randy L L
Corporation

IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

NADIA ROBERTS, an individual,

Case No. **3:24-CV-00523-HZ**

Plaintiff,

**DECLARATION OF Wael Rafeh
IN SUPPORT OF DEFENDANT'S
MOTION FOR AN AWARD OF
ATTORNEY FEES AND COSTS**

v.

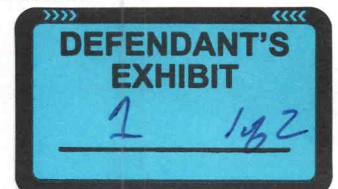
**RANDY LL CORPORATION, an Oregon
Corporation,**

Defendant.

I, Wael Rafeh, declare as follows:

1. I am the secretary of Randy L L Corporation, Defendant in the above-entitled matter and I have personal knowledge of the following facts and am competent to testify to the matters set forth below and the following is true to the best of my knowledge, information, and belief.
2. The height of the counter at the Mobil gas station located at 5322 SE 82nd Avenue, Portland, Oregon 97266 is 35 inches high. This counter was the same height in January 2024. Attached as Exhibit A are two photos, taken on November 22, 2024,

¹ DECLARATION OF Wael Rafeh IN SUPPORT OF DEFENDANT'S MOTION FOR AN AWARD OF ATTORNEY FEES AND COSTS



that I took of a tape measure illustrating the height of the counter.

3. At the time this meritless lawsuit was filed against Randy L L Corporation, I was in the process of selling the business. However, this meritless lawsuit delayed that sale, causing significant economic damages to the corporation and caused myself significant emotional distress, that we estimated, for purpose of settlement efforts with the Plaintiff, for those damages to be \$25,000.00. If necessary, we intended to file counterclaims against Plaintiff in an effort to recover these damages.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 2nd day of January, 2025.

/s/ Wael Rafeh

Wael Rafeh

President, Randy L L Corporation



